



**DLA Piper LLP (US)**  
1201 North Market Street  
Suite 2100  
Wilmington, Delaware 19801-1147  
www.dlapiper.com

Stephanie E. O'Byrne  
Stephanie.OByrne@us.dlapiper.com  
T 302.468.5645  
F 302.691.4745

September 7, 2022

*VIA CM/ECF*

The Honorable Christopher J. Burke  
United States District Court  
For the District of Delaware  
844 N. King Street, Room 2325  
Wilmington, DE 19801-3555

**Re: Advanced Cluster Systems, Inc. v. NVIDIA Corp., C.A. No. 19-2032-MN-CJB**

Dear Judge Burke:

Defendants NVIDIA Corporation, NVIDIA Singapore Pte. Ltd, and NVIDIA International, Inc. ("NVIDIA") respectfully submits the attached proposed orders in connection with its opening discovery dispute letter brief (D.I. 198).

The first order correlates to NVIDIA's request that the Court order an *in camera* inspection of Plaintiffs' withheld documents before the discovery conference. The second correlates to the relief sought by NVIDIA's motion to compel.

Respectfully,

*/s/ Stephanie E. O'Byrne*

Stephanie E. O'Byrne (DE Bar #4446)